

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

UNITED STATES OF AMERICA	)	
	)	
v.	)	CR. NO. 2:21-CR-49-MHT-JTA-3
	)	
WILLIAM RICHARD CARTER, JR.	)	

**JOINT MOTION IN LIMINE TO PREADMIT EXHIBITS**

Comes now the United States of America, by and through Alice S. LaCour, Attorney for the United States Acting Under Authority Conferred by 28 U.S.C. § 515, along with Defendant William Richard Carter, Jr., and files this joint motion in limine to pre-admit exhibits.

On December 27, 2021, the government filed an unopposed motion in limine to pre-admit proposed government's exhibits 1 through 2,509 (consisting of 4,276 total exhibits). Doc. 204. On January 4, 2022, the Court granted the motion and admitted those exhibits. Doc. 207.

Since that time, the government has identified additional items it wishes to introduce at trial. The government has provided these items to the attorneys representing Defendant William Richard Carter, Jr. and, as to the items identified in this motion, Carter does not oppose the pre-admission of these additional items.

Accordingly, the government moves to pre-admit the following proposed exhibits: 352C, 1213D, 1044C, 2510A, 2510B, 2510C, 2510D, 2511A, 2511B, 2511C, 2512A, 2512B, 2512C, 2512D, 2512E, 2513, 2514, 2515, 2516, 2517, 2518, 2519, 2520, 2521, 2522, 2523, 2524, 2525, 2526, 2527, 2528, 2529, 2530, 2531, 2532, 2533, 2534, 2535, 2536, 2537, 2538, 2539, 2542, 2543, 2544, 2545, 2546, 2547, 2548, 2550, 2551, 2552, 2553, 2554, 2555, 2556, 2557, 2558, 2559, 2560, 2561, 2562, 2563, 2564, 2565, 2568, 2569, 2570, 2575, and 2576.<sup>1</sup>

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<sup>1</sup>The parties were unable to reach agreement on the admissibility of government's proposed exhibits: 2540, 2541, 2549, 2566, 2571, 2572, 2573, and 2574. Each of the proposed exhibits at issue are summary charts. The

Additionally, the government has reviewed the defendant's proposed exhibits. It has no objection to the admission of the following of the defendant's proposed exhibits: 1, 2, 3, 4, 5, 6, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, and 48.<sup>2</sup> The defendant moves to preadmit those exhibits as well.

The parties file this motion jointly and without opposition.

Respectfully submitted, this 21st day of February, 2022.

ALICE S. LACOUR  
ATTORNEY FOR THE UNITED STATES  
ACTING UNDER AUTHORITY  
CONFERRED BY 28 U.S.C. § 515

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Agreed to and respectfully submitted this 21<sup>st</sup> day of February, 2022.

/s/ Kepler Funk & /s/ Alan Diamond  
**Alan S. Diamond, Esquire**  
**Kepler B. Funk, Esquire**

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government will attempt to admit each of the objected-to exhibit late in the trial, through the testimony of either a case agent or the government's forensic accounting expert, Lindsay Gill. Exhibit 2567 is intentionally omitted.

<sup>2</sup>The government opposes the admission of the defendant's proposed exhibits 7 through 23. Defendant's exhibit 35 is omitted.

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**CERTIFICATE OF SERVICE**

I hereby certify that on February 21, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

Respectfully submitted,

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